

# EXHIBIT 2

## Message

**From:** Wells, Peter [/O=KAYESCHOLER/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=WELLS\_P]  
**Sent:** 11/27/2012 5:05:48 PM  
**To:** 'Adam Larosa' [alarosa@argremgt.com]  
**CC:** Ben-Jacob, Michael [/O=KAYESCHOLER/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Ben\_m]  
**Subject:** RE: Duet / Argre / Scotia  
**Attachments:** Opinion Argremgt - Pension Funds - US Treaty 02052012 (2).docx

Adam,

Our understanding and view is that the term “beneficial owner” for purposes of question number two is a question of Belgian internal law. On that basis the advice received from Belgian counsel (the most recent draft opinion that I have seen is attached) has been that for purposes of the form the pension plan is economically entitled to the dividends that are derived from the investments made by the partnership. Therefore, the view of Belgian counsel is that pension plan should be considered to be the beneficial owner for purposes of the form. On the basis of this advice, and assuming nothing has changed in this regard, we confirm that you can sign the form.

Regards,  
 Peter

\*\*\*

IRS CIRCULAR 230 DISCLOSURE: To ensure compliance with Treasury Department regulations, we inform you that any U.S. federal tax advice contained in this correspondence (including any attachments) is not intended or written to be used, and cannot be used for the purpose of (i) avoiding penalties that may be imposed under the U.S. Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

Peter Wells  
**KAYE SCHOLER LLP**  
 425 Park Avenue | New York, New York 10022  
 T: +1 212.836.8662 | F: +1 212.836.6447  
[peter.wells@kayescholer.com](mailto:peter.wells@kayescholer.com) | [www.kayescholer.com](http://www.kayescholer.com)

This message may contain confidential and/or legally privileged information from the law firm Kaye Scholer LLP. If delivered to anyone other than the intended recipient, please notify the sender immediately by return email or by telephone (+1 212.836.8662) and delete the message, along with any attachments, from your computer. Thank you.

**From:** Adam Larosa [mailto:alarosa@argremgt.com]  
**Sent:** Tuesday, November 27, 2012 10:51 AM  
**To:** Ben-Jacob, Michael; Wells, Peter  
**Subject:** FW: Duet / Argre / Scotia

Folks – I think Rich sent this to you the other day – I need to sign today – any issues? Seems straight forward but please let me know if you have any issues.

**Adam La Rosa**  
 Director  
 Argre Management LLC  
 40 West 57th Street  
 New York, New York 10019  
 Tel: 212-247-2600  
 Mobile: 732-272-4445  
 Fax: 212-247-2753  
 e-mail: [alarosa@argremgt.com](mailto:alarosa@argremgt.com)

---

**From:** Jonathan Sander [mailto:JSander@duetgroup.net]  
**Sent:** Thursday, November 22, 2012 9:49 AM  
**To:** Richard Markowitz  
**Cc:** Jérôme LHOTÉ; Matthew Stein; John H. van Merkensteijn, III; Adam Larosa; 'Robert Klugman'; globalequity  
**Subject:** Duet / Argre / Scotia

Richard,

Please see the attached Annex 26 which re have re-requested from Scotia to make sure that it is the current version.

Please can you complete and send the original to Vijaya at the below address:

Vijaya Sankar  
Duet Group  
27 Hill Street  
London, W1J 5LP  
T +44 (0) 20 7290 9806  
M+44 (0) 7920 402 594  
F +44 (0) 20 7290 9735

As a separate matter, we have confirmed with Scotia that any subordinated loan (if this is the route pursued) denominated in USD to Hamlyn LP will not need to be converted into EUR for the purposes of conducting the trades.

Regards

Jonathan

\*\*\*\*\*  
DUET ASSET MANAGEMENT LIMITED is authorised and regulated by the Financial Services Authority  
\*\*\*\*\*

Internet communications cannot be guaranteed to be confidential, secure or error-free as information could be intercepted, corrupted, lost, arrive late or contain viruses. The sender therefore does not accept liability for any errors or omissions in the context of this message which arise as a result of Internet transmission.

Unless otherwise stipulated herein, any opinions contained in this message are those of the author and are not given or endorsed by the company through which this message is sent.

Nothing in this message or in its attachments should be construed as a solicitation or offer, or recommendation, to acquire or dispose of any investment or to engage in any other transaction.

---

This email has been scanned by the Symantec Email Security.cloud service.  
For more information please visit <http://www.symanteccloud.com>

---